

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
MONIQUE KIRTLEY
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261

6 Attorney for Ryan Timothy

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 TIMOTHY RYAN,

14 Defendant.

Case No. 2:15-mj-807-GWF

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(First Request)

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Brandon C. Jaroch, Assistant United States Attorney, counsel for
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Monique
19 Kirtley, Assistant Federal Public Defender, counsel for Timothy Ryan, that the Preliminary
20 Hearing currently scheduled on Thursday, November 12, 2015 at 4:00 p.m., be vacated and
21 continued to a date and time convenient to the Court, but no earlier than thirty (30) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. Undersigned defense counsel was only recently assigned this case and filed her
24 notice of appearance on October 30, 2015.
- 25 2. Defendant is detained at Pahrump and defense counsel needs additional time to
26 schedule a visit to meet with the defendant to discuss the details of this case.

1 3. The parties have entered negotiations and need the additional time to resolve
2 this matter.

3 4. Additionally, denial of this request for continuance could result in a
4 miscarriage of justice.

5 This is the first request for continuance filed herein.

6 DATED this 3rd of November, 2015

7
8 RENE L. VALLADARES
Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

9
10 /s/ *Monique Kirtley*
By _____

/s/ *Brandon C. Jaroch*
By _____

11 MONIQUE KIRTLEY
12 Assistant Federal Public Defender

BRANDON C. JAROCH
Assistant United States Attorney

1
2
3 **UNITED STATES DISTRICT COURT**
4 **DISTRICT OF NEVADA**

5 UNITED STATES OF AMERICA,

6 Plaintiff,

7 v.

8 TIMOTHY RYAN,

9 Defendant.
10

Case No. 2:15-mj-807-GWF

ORDER

11
12 Based on the Stipulation of counsel and good cause appearing,

13 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
14 November 12, 2015 at the hour of 4:00 p.m., be vacated and continued to December 14, 2015
15 at the hour of 4:00 p.m.

16 DATED this 3rd of November, 2015

17
18 
19 UNITED STATES MAGISTRATE JUDGE
20
21
22
23
24
25
26